



Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)  
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October 31, 2014

*via electronic filing*

Marlene H. Dortch  
Secretary, Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: Telecommunications Relay Services • CG Docket No. 03-123  
Provision of Internet Protocol Relay Services**

Dear Ms. Dortch,

On October 29, 2014, Andrew Phillips and Braden Forbes of the National Association of the Deaf (NAD), Lise Hamlin of the Hearing Loss Association of America (HLAA), and myself of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) collectively, “Consumer Groups,” met with Eliot Greenwald of the Disability Rights Office and Caitlin Vogus of the Consumer and Governmental Affairs Bureau to discuss the above-referenced matter.

We gave FCC officials our take of the developments that have transpired recently which resulted in Purple Communications’ exit from the IP-Relay market effective November 14, 2014. Here were the key points we made with the FCC officials in the meeting as follows:

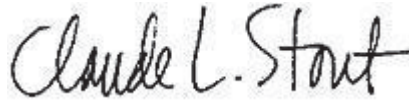
- 1.) We encouraged the FCC to send an official statement to the TRS user community on Purple’s IP Relay situation.
- 2.) IP Relay continues to be a vital form of relay services for the deaf and hard of hearing population, possibly more so for those who are deaf-blind or have low vision.
- 3.) Purple’s IP Relay has some important features that the remaining provider doesn’t currently provide such as IP Relay through AOL Instant Messenger (AIM). Being able to use IP Relay through AIM is very important to those who are deaf-blind or have low vision as they are able to customize size, text, font, etc for better reading.
- 4.) We shared strong concerns about the FCC potentially collecting private information about IP Relay calls. We are very opposed and believe it’s a violation of the confidentiality of our relay calls. We thus asked Consumer & Governmental Affairs Bureau to follow up with the Office of Managing Director, FCC, and Rolka Loube and Saltzer Associates (RLSA), the administrator for the Interstate TRS Fund, and instruct RLSA not to collect information about the content of the call. In light of what happened, the FCC must reaffirm its long-standing policy and procedures on call confidentiality to the community, a principle we all hold dear.
- 5.) We want to see a healthy, robust and very accessible IP Relay environment and urge the FCC to take measures to ensure IP Relay accessibility and usability is at the highest level.
- 6.) Also we encourage the FCC to be mindful of economies of scale in an environment with much less IP Relay minutes, so that providers are attracted to the market, are adequately compensated for their

services, are competitive, and have incentives to innovate.

Last but not least, we strongly recommended that the Commission makes immediate contact with the leaders of the deaf-blind community, particularly the new President of American Association of the Deaf-Blind, Mr. Mark Gasaway to discuss the recent Purple IP-Relay crisis, and to review transitional measures that will be taken to address their concerns. Mr. Gasaway's email address is: [mark.gasaway@comcast.net](mailto:mark.gasaway@comcast.net)

Please don't hesitate to contact me if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in black ink that reads "Claude L. Stout". The signature is written in a cursive, flowing style.

Claude L. Stout  
Executive Director  
Telecommunications for the Deaf and Hard of Hearing, Inc.

cc: Meeting attendees  
Maria Kirby, Legal Advisor - Media, Consumer and Governmental Affairs, and Enforcement, Office of  
FCC Chairman Tom Wheeler  
Kris Monteith, Acting Chief, Consumer & Governmental Affairs Bureau, FCC  
Karen Peltz-Strauss, Deputy Chief, Consumer & Governmental Affairs Bureau, FCC  
Gregory Hlibok, Chief, Disability Rights Office, CGB, FCC  
David Schmidt, TRS Fund Program Administrator, Office of Managing Director, FCC